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ORANGE COUNTY LOS ANGELES SAN FRANCISCO SACRAMENTO FRESNO

December 23, 2021

Zachary Kweiler, Esq.
Pacific Workers' Compensation Law Center
333 Hegenberger Rd., Ste. 504
Oakland, CA 94621

Re: Jonathan Shockley v. Biotelemetry, Inc. dba Cardionet, LLC

WCAB No: ADJ12031731
Claim No: 040519008736

Dear Mr. Kweiler:

As you can see, following the deposition of QME Dr. Stoller, there are numerous issues with his reporting.

It is also assumed, according to the AMA Guides, that your client was not giving his best effort during the grip strength testing, and this calls into question all of your client's subjective complaints. Based on these issues, I believe \$30,000.00 is a reasonable Compromise and Release at this time. Upon receipt of the deposition transcript and supplemental report, I will request a DEU rating.

Kindest Regards,

COLANTONI, COLLINS, MARREN, PHILLIPS & TULK, LLP

BY:

A handwritten signature in black ink, appearing to read 'Amy', is written over a horizontal line.

AMY E. OLSON

AEO/mg

cc: *Mario Castro/Chubb Group of Insurance Companies (Via Email Only)*
 wcclaimsw2@chubb.com



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PANEL QME – REQUEST FOR SUPPLEMENTAL REPORT

Adam Stoller, M.D.
1900 O'Farrell St., Ste. #190
San Mateo, CA 94403

Re: Jonathan Shockley v. Biotelemetry, Inc. dba Cardionet, LLC

WCAB No: ADJ12031731
Claim No: 040519008736

Dear Dr. Stoller:

Thank you for your ongoing assistance in this claim. Unfortunately, we were not able to complete the deposition due to time constraints. In lieu of a subsequent deposition, I am requesting a supplemental report to address my remaining inquiries.

In your March 11, 2021 report, you note that "at the median nerve at the wrist, he has occasionally distorted tactile sensibility that interferes with some activities, that is 40%, which is 15% upper extremity impairment of the right median and left median sensory nerves".

Please outline the testing that you conducted to confirm the presence of occasionally distorted tactile sensibility to the median nerve. Was there any objective evidence of this, or did you rely on Applicant's subjective complaints to make that determination?

Thank you for your attention to these matters.

Kindest Regards,

COLANTONI, COLLINS, MARREN, PHILLIPS & TULK, LLP

BY: A handwritten signature in dark ink, appearing to read 'Amy', is written over the 'BY:' label.

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